

April 4, 2023

BY ECF

Honorable Jennifer L. Rochon
United States District Judge
United States District Court
500 Pearl Street
New York, NY 10007

Re: *ACLU v. FBI*, 21 Civ. 10719 (JLR)

Dear Judge Rochon:

In accordance with the Court's February 6, 2023 Order, ECF No. 27, we write jointly on behalf of Defendant the Federal Bureau of Investigation ("FBI") and Plaintiff the American Civil Liberties Union ("ACLU") to provide the Court an update on the status of this matter.

After further communication between the parties, on March 17, the ACLU narrowed its request and asked the FBI to lift one redaction on one document. On April 4, the FBI provided the document to the ACLU with the redaction lifted. The parties therefore agree that all issues related to document production and redactions have been resolved.

The only remaining step in this matter is to come to an agreement about attorneys' fees. The parties intend to work together to attempt to resolve this issue without litigation. The parties can provide the Court with an update on the status of this matter within 30 days.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

By: /s/ Dominika Tarczynska
DOMINIKA TARCZYNSKA
Assistant United States Attorney
Tel. (212) 637-2748
Fax (212) 637-2686
dominika.tarczynska@usdoj.gov
Attorney for Defendant

And

/s/ Laura Moraff
Laura Moraff
Nathan Freed Wessler
American Civil Liberties Union Foundation
125 Broad Street, 18th Floor
New York, NY 10004

(212) 549-2500
lmoraff@aclu.org
nwessler@aclu.org

Robert Hodgson
New York Civil Liberties Union Foundation
125 Broad Street, 19th Floor
New York, NY 10004
(212) 607-3300
rhodgson@nyclu.org

Counsel for Plaintiff